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Attorney for Plaintiff  
QUO VAT ESTELL

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

QUO VAT ESTELL,

Plaintiffs,

vs.

JOHN MCHUGH,

Defendants

Case No.: 15-cv-04898-MEJ

**PLAINTIFF'S REQUEST FOR  
CONTINUANCE OF INITIAL  
CASE MANAGEMENT  
CONFERENCE AND RELATED  
DATES**

Plaintiff Quo Vat Estell, by and through her attorney Maureen McFadden, respectfully requests that the Court continue the initial case management conference currently set for January 28, 2016 at 10:00 a.m., and all related dates, by about 90 days or at the Court's convenience.

The complaint and related documents were not timely served on defendant. Ms. McFadden is a sole practitioner. She is also the single mother of a toddler son, and legally responsible for making health care and other decisions on behalf of her very sick mother, Kathleen McFadden, who lives in Southern California. In recent

months, Ms. McFadden has been required to take substantial time away from work to deal with emergencies relating to her mother.

Additionally, Ms. Estell's complaint needs to be amended to include related claims that are currently the subject of an EEO proceeding, *Quo Vat Estell v. U.S. Army*, EEOC Case No. 550-2015-00087x, assigned to the Honorable David Kelley. Plaintiff's counsel had intended to wait for Judge Kelley's order on a hearing held August 21, 2016<sup>1</sup> prior to moving those claims into Ms. Estell's case now pending in this Court. For unknown reasons, Judge Kelley has still not issued that order. Ms. Estell is not willing to accept any further delays and wishes to have all her claims proceed in this Court as soon as possible, regardless of the status of Judge Kelley's issuance of the order from the August 21, 2015 hearing.

Ms. McFadden anticipates having the amended complaint filed and served by the end of this week.

DATED: January 19, 2016      LAW OFFICES OF MAUREEN E. MCFADDEN

By: \_\_\_\_\_  
Maureen E. McFadden

Attorney for Plaintiff  
QUO VAT ESTELL

The Case Management Conference is CONTINUED to May 5, 2016 at 10:00 a.m. All deadlines are adjusted accordingly.

Dated: January 20, 2016



<sup>1</sup> The hearing related to plaintiff's requested amendments in that matter, and scheduling issues.